

Defendant.


JUDGE CRABB

3. If Rasier, LLC (“Rasier”)—Uber’s wholly owned subsidiary and licensee of Uber’s proprietary information, including Uber’s ridesharing platform software application—is prohibited from operating its business in the City of Madison, Rasier and Uber would suffer significant lost profits that would exceed \$100,000 in a calendar year. I am familiar with the licensing revenues and profits that Uber generates from ridesharing request activities in various Midwest cities and in the communities surrounding Madison, Wisconsin. Based on my experience in those cities and given the demand for ridesharing services by Madison residents, interested drivers, and local businesses, the lost profits to Uber as a result of prohibiting

ridesharing activities in Madison, Wisconsin requested through Uber's ridesharing platform would certainly exceed \$100,000 in a calendar year.

4. If Rasier or Uber were required to obtain licenses and permits and change their businesses so that they operated as if they were public passenger services in Madison, as described in and regulated by the Madison General Ordinances, the cost of doing so would exceed \$100,000.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Adam Dries

Dated: 03/24/15